

)	No. 3:06-MD-1760
IN RE: AREDIA® AND ZOMETA®)	
PRODUCTS LIABILITY LITIGATION)	JUDGE CAMPBELL
(MDL No. 1760))	
)	MAGISTRATE JUDGE BROWN
This Document Relates To:)	
ALL CASES)	
)	

Novartis Pharmaceuticals Corporation (“NPC”) hereby files its proposed Case Management Order (the “CMO”), attached hereto as Exhibit A. Despite NPC’s best efforts, NPC and plaintiffs have been unable to agree on a case management order, necessitating the filing of separate proposals. For the convenience of the Court, NPC has also attached a “redline” version showing the differences between NPC’s and plaintiffs’ proposals (*see* Exhibit B). As the Court requested during the June 29, 2006 status hearing and during a telephone conference with Plaintiff’s Liaison Counsel and counsel for NPC on July 18, 2006, NPC has contemporaneously transmitted a copy of its proposed CMO in Word Perfect and Word format and the redline of the two proposed orders in .pdf format to the Court’s Chambers at:

joe b brown@tnmd.uscourts.gov and patricia w whitley@tnmd.uscourts.gov.

Case 3:06-md-01760 Document 85 Filed 07/18/06 Page 1 of 3 PageID #: 726

Respectfully submitted,

July 18, 2006

/s/ Robert E. Johnston
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CERTIFICATE OF SERVICE

I hereby certify that I have on this 18th day of July 2006 served a true and correct copy of the foregoing Novartis Pharmaceuticals Corporation's Notice of Filing Proposed Case Management Order, by operation of the Court's Electronic Case Filing System, on Plaintiffs'

Liaison Counsel:

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/s/ Robert E. Johnston
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